

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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MRS. UNITED STATES NATIONAL PAGEANT, INC.,

Plaintiff,  
vs.

**DECLARATION OF  
EMILY SIMMONS**

Case No.

STEPHANIE L. WILLIAMS, CROWN GARLAND LLC, and  
COSMOS INTERNATIONAL PAGEANTS, INC.

Defendants.

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STATE OF NORTH DAKOTA    )  
COUNTY OF GRAND FORKS    ) ss:

**EMILY SIMMONS** declares under penalty of perjury that:

1.     I am an individual residing in Grand Forks, North Dakota. I am over eighteen years old. I make this Declaration at the request of Plaintiff Mrs. United States National Pageant, Inc. (“Mrs. United States”).

**State Pageant**

2.     In November 2017, I was recruited to compete in the Miss North Dakota United States pageant. I believe I was recruited because I had experience competing in different pageant systems. I competed in the state-level Miss United States pageant held on March 25, 2018 and was crowned Miss North Dakota United States. By winning the state-level pageant, I qualified to participate in the Miss United States National Pageant.

3.     Two days after I won my title, I received an email from an individual named Stephi Williams who stated she was the National Director for the Miss United States Pageant. The email stated that Stephi’s company, Crown Garland LLC, was a in a legal

dispute with the North Dakota directors that ran our pageant. The email implied there may be an issue with the title that I won and requested a conference call with her “national staff” and my parents. A true and accurate copy of this email and my response is attached as **Exhibit L**.

4. After receiving the email, I participated in the requested conference call on or about March 29, 2018, with my mother, Susan Simmons. The winners of other Mrs. United States North Dakota and Mrs. United States South Dakota divisions also participated on the call. Ashley Martinez, an individual associated with Stephi Williams, participated as well.

5. During the call, Stephi Williams told us that our titles were not “official” because the North Dakota and South Dakota State Director (same person) was in breach of a contract with her. We were told that we would not be allowed to participate in the Mrs. United States National Pageant unless a fee owed by the State Director was covered. We were also told that we should not have access to Mrs. United States Facebook pages because we were not “technically” titleholders. Ms. Williams informed us that our crowns and sashes would be withheld from us until the director fees related to each titleholder were paid. I took this to mean that in addition to the fees we had already paid and those associated with participating in the National Pageant, we would be expected to pay Stephi Williams an additional amount.

6. The call left me confused because I had paid all my fees to participate in the state-level pageant. I was surprised Ms. Williams was asking for more money. After the conference call, three titleholders in different categories from North Dakota and South

Dakota resigned. This ordeal marked the beginning of many remarkable communications from Stephi Williams and Crown Garland.

7. While I do not know the full details as to why, I was ultimately allowed to compete in the National Pageant as Miss United States North Dakota. In addition to significant fees incurred by me and my family, I was required to secure \$1,000 to pay for an advertisement page in the pageant program. Stephi Williams or Crown Garland provided me with a Miss United States National Pageant Titleholder Agreement that is attached as **Exhibit M**.

8. As detailed below, my experience as Miss United States North Dakota was disappointing. The National Director Stephi Williams was unorganized. The pageant activities frequently fell behind schedule. Stephi Williams and her associates posted negative and confusing comments about Plaintiff Mrs. United States and frequently brought up Stephi Williams' future position at competing pageant companies.

#### **YouTube Submission**

9. Prior to the 2018 National Pageant, in May or June 2018, Stephi Williams instructed me and the other state titleholders to submit videos about ourselves. I believed the purpose was to promote the National Pageant and the Mrs. United States brand. Stephi informed us that the videos would be uploaded to YouTube for a series entitled "The Queen Behind The Crown."

10. Stephi Williams told the contestants to submit video footage without music or introductions as she and her staff would edit the videos before uploading them. I submitted my video by the June 10, 2018 deadline. My video, along with several others, was uploaded to the Crown Garland YouTube page on or around June 20, 2018.

11. After my video was uploaded to YouTube, it featured music and a logo that featured a silhouette of a woman with a crown. I believed it was the Miss United States logo. It was the same logo that appeared on the cover of the Miss United States Titleholder Agenda distributed at the National Pageant. A true and accurate copy of this agenda cover is attached as **Exhibit N**.

12. I was a member of Facebook group called “2018 MUSP Delegates” along with other state titleholders that were participating in the Miss United States Pageant. Stephi Williams and her staff would post in this group to communicate with us.

13. On June 25, 2018, Ashley Martinez, who I knew was associated with Stephi Williams because of the conference call earlier in the year, made a post in the titleholder Facebook group that stated: “Due to recent operating standards set forth by Mr. Ilacqua, the videos currently on YouTube have to be removed in order to be in compliance.” Her post further stated that the videos would be re-uploaded “within the next day as they were originally submitted, even if they do contain the trademark language owned by Crown Garland.” I took a screenshot of this post on my phone. A true and accurate copy of the screenshot I took is attached as **Exhibit O**.

14. I was confused because I thought that Stephi Williams was on the same team as Plaintiff Mrs. United States. Along with other contestants, I spent significant time preparing my video. Without the editing, it appeared unprofessional. Again, we were told to submit unedited versions to begin with.

15. We were told that the amount of views we had on our YouTube videos were to be counted as “votes” for an additional contest at the National Pageant. I believe that

Crown Garland's removal of the edited videos down negatively affected me and other Miss United States' contestants.

16. I never would have submitted a video had I known that the unedited version was going to be posted. I filed a complaint with YouTube requesting the unedited video to be removed from the Crown Garland YouTube channel. The video was eventually removed.

#### **Pageant Operating Standards Facebook Post**

17. On June 25, 2018, Stephi Williams made an unusual post to the "2018 MUSP Delegates" titleholder Facebook page. The post stated that she wanted to keep the titleholders and the State Directors informed of "unexpected changes recently imposed by [Plaintiff] Mrs. United States National Pageant, Inc." The post further states that she received new Pageant Operating Standards that require proof of age and residency. The post threatened that the requirements "would disqualify the majority of the delegates." I took a screenshot of this post on my phone. A true and accurate copy of the screenshot I took is attached as **Exhibit P**. This post casts blame upon Plaintiff Mrs. United States and Tony Ilacqua for these allegedly new requirements. When I read the email, I was confused again about the tension between the National Director and the pageant company.

18. I believe Stephi Williams' June 25, 2018 post caused worry and confusion among the titleholders. On the next day, Stephi Williams made another post stating "I am sorry if my post yesterday alarmed you in any way. For transparency and legal reasons, it was necessary that I do so." This post goes on to state that Crown Garland has the titleholders' "best interests at heart." I took a screenshot of this post on my phone. A true and accurate copy of the screenshot I took is attached as **Exhibit Q**. I believe this post

implied that Plaintiff Mrs. United States and Tony Ilacqua were not acting in the best interest of the titleholders. Again, I found this confusing. These comments disparaging the national pageant company and its president were being made in the days leading up to the National Pageant.

### **2018 National Pageant Registration and Orientation**

19. The 2018 Mrs. United States National Pageant was held from July 2 through July 7, 2018 at the Omni Hotel near Orlando, Florida. I attended and competed for the Miss United States title. The other Mrs. United States titles were awarded at the pageant as well.

20. On the morning of July 3, 2018, during Orientation, Ms. Williams did not discuss customary pageant information such as scheduling. Instead, she spent most of the time discussing her future pageant work after her contract with Mrs. United States ended.

21. I was also handed a program which featured advertisements of all the contestants. The first page of the program features a letter from Stephi Williams that mentions her work with competing pageant companies, Miss Arnold Fitness and Cosmos International Pageants. The letter also claims that the Miss United States pageant “was barely recognized before Crown Garland repaired its failing structure.” A true and accurate copy of the program cover, the letter, and my advertisement are attached as **Exhibit R**.

22. Further, at the National Pageant, copies of the Summer 2018 issue of *Pageantry* magazine were distributed to contestants and guests. This magazine featured a cover story promoting the 2018 Miss Arnold Fitness competition as well as an advertisement for the 2019 Miss Arnold Fitness competition. The story in the article quotes

Stephi Williams promoting the Miss Arnold brand. A true and accurate copy of the relevant excerpts from this magazine (with redaction of minors' names) are attached as **Exhibit S**.

### **Rumors Spread by Stephi Williams**

23. On July 5, 2018, the contestants gathered in a smaller room of the Omni Hotel to prepare for the swimsuit rehearsal. I observed a male wearing what I believed to be an Omni Hotel shirt walk into the room. I believed he was a member of the Omni Hotel staff. The male looked around and left. I believed it was innocuous and I did not perceive it as a threat.

24. Later, Stephi Williams addressed this situation with the contestants, directors, and our families. Ms. Williams implied that the male who entered the room during swimsuit rehearsal was associated with Tony Ilacqua and the Plaintiff Mrs. United States, Inc. Ms. Williams stated that we were being "counted like sheep" and further implied our safety was in danger. I observed other contestants fear for their safety. This led to rumors among contestants that the Plaintiff Mrs. United States was involved in sex trafficking.

25. Ms. Williams and the Crown Garland staff did nothing to stop these rumors. Instead, Ms. Williams insisted that we travel in groups, including to rehearsals for the evening gown competition held in the morning of July 6, 2018. Her insistence perpetuated rumors that the contestants were not safe and that the Plaintiff Mrs. United States was responsible for our lack of safety. By this time, I had realized that Stephi Williams would rather disparage the Mrs. United States brand than reassure the contestants that we were safe.

### **Retaliation for Meeting with Tony Ilacqua**

26. On July 6, 2018, I requested and had a meeting with Tony Ilacqua, along with Miss Teen North Dakota United States, Shawnee Kaseman. My mother, Susan Simmons, and North Dakota State Director Hailee Wieland also attended. Mr. Ilacqua was staying at the Omni Hotel, but I did not observe him attend any pageant events. We requested the meeting to voice our concerns about Stephi Williams, the pageant experience, and our perceived unequal treatment of some contestants.

27. I believe several Crown Garland workers observed us walk into Mr. Ilacqua's room.

28. Later that evening, I attended the Preliminary Evening Gown competition. Several girls that I had never spoken to before asked me why I did not attend an optional social event that was held during the time I met with Mr. Ilacqua. I inferred that gossip had spread concerning my meeting.

29. During the Preliminary Evening Gown competition, Stephi Williams sat behind the judges and cheered for certain contestants. I observed her loudly cheer for Miss North Carolina United States who went before me. When I walked out, Stephi Williams did not cheer and I observed her glaring at me. I inferred that she knew I had met with Mr. Ilacqua and that she was upset with me.

30. On the evening of July 7, 2018, I attended the Miss Teen United States final, which was held before the Miss United States final that I competed in. Rene Boanet, an individual who worked for Stephi Williams and/or Crown Garland, initially denied me entry despite letting other contestants in the room.



31. Before my pageant started, I gathered my family and friends and apologized for the experience. I understood the time and resources they spent to come to Florida to support me. I asked them to not attend my pageant, which would have cost them an additional \$80.00 each.

32. For reasons that I could more fully detail but have not for the sake of brevity, I was convinced that the pageant was corrupted, and I had no chance of winning. It appeared to me that contestants from some states were given favorable treatment from Stephi Williams and Crown Garland. Nevertheless, I kept my personal commitments to participate in the pageant even though I believed it was rigged against me.

33. The Miss United States final pageant started over two hours late. I did not advance as a finalist for Miss United States and was eliminated from the competition.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 27, 2018.

s/ Emily Simmons  
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EMILY SIMMONS